



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 28, 2017

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *BH*
Reports Analysis Division *ll for KDR*
Compliance Branch

SUBJECT: Reason To Believe Recommendation - 2016 30 Day Post-General Report
(Unauthorized Filers) for the Administrative Fine Program

2017 MAR 28 PM 10:19

Attached is a list of political committees and their treasurers who failed to file or timely file the 2016 30 Day Post-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized committees that failed to file or timely file the 2016 30 Day Post-General Report.

The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report within thirty (30) days of the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachment.

In order to determine the level of activity for unauthorized quarterly filers that failed to file or failed to timely file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2016 through November 28, 2016 (59 days),

was reviewed for activity which would have required the filing of a 12 Day Pre-General Report (12 Day Report). If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 32.2% (19 days (12G Filing Period)/59 days (30G Filing Period)).

- The committees identified through this process as failing to file or failing to timely file the 12 Day Report were included in the Reason to Believe Recommendation circulated to the Commission on March 20, 2017. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will also be assessed a fine for the 30 Day Report based on the estimated levels of activity described above and are included on the attached list.

Recommendation

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

COURT REPORT

Federal Election Commission
Reason to Believe Circulation Report
2016 POST-GENERAL Not Election Sensitive 12/08/2016 UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3253	C00623256	AMERICA COMES FIRST PAC		DAVID W. SCHAMENS	\$463,211	0	12/14/2016	6	\$5,491	\$101
3254	C00461624	ARTICLE 1 POLITICAL ACTION COMMITTEE		RICK GALENA	\$182,587	0	12/29/2016	21	\$27,300	\$823
3255	C00559146	BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC)		JERED TAYLOR	\$206,543	0	1/26/2017	Not Filed	\$9,042	\$392
3256	C00531285	BRADY VICTORY FUND	KEVIN BRADY	MICHAEL J. KARLINS	\$2,174,702	0	12/14/2016	6	\$150,642	\$2,360
3257	C00496927	CITIZENS SUPER PAC FOR AMERICA (CSPAC)		SIDDIQ MUMIN	\$232,710	1		Not Filed	\$46,542 (est)	\$1,470
3258	C00109595	COMMUNICATION WORKERS OF AMERICA LOCAL 13000		MARISA MACCRORY	\$460,660	0	1/5/2017	28	\$23,264	\$307
3259	C00388181	CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION		JOHN P. LACEY	\$123,191	0	1/31/2017	Not Filed	\$2,500	\$326
3260	C00191288	DC REPUBLICAN PARTY FEDERAL ACCOUNT		RODERICK JOHNSON	\$158,584	0	1/17/2017	Not Filed	\$870	\$326
3261	C00146605	FARMERS' RICE COOPERATIVE FUND		BILL TANIMOTO	\$156,561	0	12/16/2016	8	\$8,200	\$113
3262	C00605634	FLORIDIANS FOR A GOOD ECONOMY		ERIC W. ROBINSON	\$125,454	0	1/30/2017	Not Filed	\$2,380	\$326
3263	C00404350	FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION		SHARLYN WOODY	\$147,245	0		Not Filed	\$24,625 (est)	\$654
3264	C00385740	FROZEN FOOD POLITICAL ACTION COMMITTEE		ALISON REICH BODOR	\$149,916	0		Not Filed	\$29,983 (est)	\$1,176
3265	C00616078	GET OUR JOBS BACK, INC.		STEVEN HOFFENBERG	\$100,648,528	0		Not Filed	\$50,324,263 (est)	\$16,671
3266	C00297531	GOVERNMENT IS NOT GOD		NANCY MURRAY	\$124,190	0	12/19/2016	11	\$5,672	\$131
3267	C00524363	GREAT LAKES SUPER POLITICAL ACTION COMMITTEE		DWIGHT WASHINGTON	\$157,500	0		Not Filed	\$31,500 (est)	\$1,176
3268	C00609859	ILLINOIS FAMILIES FIRST		D. PAUL CAPRIO	\$156,475	0	1/31/2017	Not Filed	\$300	\$300
3270	C00291799	MASON CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE-MACPAC		JEFF BUCZKIEWICZ	\$101,203	0	1/4/2017	27	\$1,000	\$195
3271	C00577148	MCCASKILL SENATE FUND	CLAIRE MCCASKILL	MICHELLE SHEROD	\$456,913	0	1/5/2017	28	\$1,132	\$201

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3272	C00343590	MECHANICAL CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (MCA-PAC) MICHIGAN DOCTORS		JOHN P. MCNERNEY	\$338,498	1	1/5/2017	28	\$6,100	\$291
3273	C00001180	POLITICAL ACTION COMMITTEE - MICHIGAN STATE MEDICAL SOCIETY		SCOT F. GOLDBERG	\$166,784	0	1/28/2017	Not Filed	\$8,702 (est)	\$392
3274	C00571950	MILLENNIALS RISING PAC		MICHELLE GOODWIN	\$107,521	0	1/20/2017	Not Filed	\$185	\$185
3275	C00528026	NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC		MICHAEL J. CORREIA	\$143,866	0	2/16/2017	Not Filed	\$24,000	\$654
3276	C00111278	NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE		WAYNE COCKFIELD	\$1,231,617	0	12/16/2016	8	\$355,478	\$4,995
3277	C00509893	NATIONAL RIGHT TO LIFE VICTORY FUND		WAYNE COCKFIELD	\$2,419,656	0	12/20/2016	12	\$512,611	\$6,797
3278	C00427203	PENINSULA DEMOCRATIC COALITION		ZACHERY ROSS	\$462,578	0	1/13/2017	Not Filed	\$2,019	\$326
3279	C00103937	PHYLLIS SCHLAFLY EAGLE FORUM PAC		JOHN SCHLAFLY	\$417,239	0	1/25/2017	Not Filed	\$2,197	\$326
3280	C00626697	RIGHTS & DEMOCRACY PROJECT		TRAVEN LEYSHON	\$109,264	0	2/22/2017	Not Filed	\$97,032	\$4,862
3281	C00574806	RUN RAY RUN		GIANNI DONATES	\$312,767	0	1/15/2017	Not Filed	\$42,836 (est)	\$1,176
3282	C00586180	RUSS VICTORY FUND		JOHN W. MILLER	\$4,097,870	0	1/4/2017	27	\$1,491,744	\$14,425
3283	C00362632	SWING STATES FOR A CONSERVATIVE WHITE HOUSE PAC INC		OFFICE OF TREASURER	\$134,449	0		Not Filed	\$44,816 (est)	\$1,176
3284	C00612846	THE DEMOCRATIC COALITION		FRANCESCA N. LUCIA	\$247,741	0	1/18/2017	Not Filed	\$22,676	\$654
3285	C00454140	TURKISH AMERICAN HERITAGE POLITICAL ACTION COMMITTEE - TURKISHPAC		TEKIN KUNT	\$130,568	0	12/20/2016	12	\$16,910	\$211

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 2016)
30 Day Post-General Report (Unauthorized)
Filers) for the Administrative Fine Program:)
AMERICA COMES FIRST PAC, and) AF# 3253
SCHAMENS, DAVID W MR. as treasurer;)
ARTICLE 1 POLITICAL ACTION) AF# 3254
COMMITTEE, and GALENA, RICK as)
treasurer;)
BELIEVE IN LIFE LIBERTY YOURSELF) AF# 3255
(BILLY PAC), and TAYLOR, JERED as)
treasurer;)
BRADY VICTORY FUND, and) AF# 3256
KARLINS, MICHAEL J as treasurer;)
CITIZENS SUPER PAC FOR AMERICA) AF# 3257
(CSPAC), and SIDDIQ MUMIN as)
treasurer;)
COMMUNICATION WORKERS OF) AF# 3258
AMERICA LOCAL 13000, and)
MACCRORY, MARISA as treasurer;)
CONNELL FOLEY PAC A NEW JERSEY) AF# 3259
NON-PROFIT CORPORATION, and)
JOHN P LACEY as treasurer;)
DC REPUBLICAN PARTY FEDERAL) AF# 3260
ACCOUNT, and JOHNSON, RODERICK)
as treasurer;)
FARMERS' RICE COOPERATIVE FUND,) AF# 3261
and TANIMOTO, BILL as treasurer;)
FLORIDIANS FOR A GOOD ECONOMY,) AF# 3262
and ROBINSON, ERIC W as treasurer;)
FRESNO COUNTY DEMOCRATIC) AF# 3263
WOMEN'S CLUB/DEMOCRATS IN)
ACTION, and WOODY, SHARLYN MS as)
treasurer;)
FROZEN FOOD POLITICAL ACTION) AF# 3264
COMMITTEE, and REICH BODOR,)
ALISON as treasurer;)

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RUN RAY RUN, and GIANNI DONATES) AF# 3281
as treasurer;)
RUSS VICTORY FUND, and MILLER,) AF# 3282
JOHN W. as treasurer;)
THE DEMOCRATIC COALITION, and) AF# 3284
LUCIA, FRANCESCA N as treasurer;)
TURKISH AMERICAN HERITAGE) AF# 3285
POLITICAL ACTION COMMITTEE -)
TURKISHPAC, and KUNT, TEKIN as)
treasurer;)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 29, 2017 the Commission took the following actions on the Reason To Believe Recommendation - 2016 30 Day Post-General Report (Unauthorized Filers) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 28, 2017, on the following committees:

AF#3253 Decided by a vote of 5-0 to: (1) find reason to believe that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W MR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3254 Decided by a vote of 5-0 to: (1) find reason to believe that ARTICLE 1 POLITICAL ACTION COMMITTEE, and GALENA, RICK in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3255 Decided by a vote of 5-0 to: (1) find reason to believe that BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC), and TAYLOR, JERED in his official

capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3256 Decided by a vote of 5-0 to: (1) find reason to believe that BRADY VICTORY FUND, and KARLINS, MICHAEL J in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3257 Decided by a vote of 5-0 to: (1) find reason to believe that CITIZENS SUPER PAC FOR AMERICA (CSPAC), and SIDDIQ MUMIN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3258 Decided by a vote of 5-0 to: (1) find reason to believe that COMMUNICATION WORKERS OF AMERICA LOCAL 13000, and MACCRORY, MARISA in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3259 Decided by a vote of 5-0 to: (1) find reason to believe that CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION, and JOHN P LACEY in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3260 Decided by a vote of 5-0 to: (1) find reason to believe that DC REPUBLICAN PARTY FEDERAL ACCOUNT, and JOHNSON, RODERICK in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3261 Decided by a vote of 5-0 to: (1) find reason to believe that FARMERS' RICE COOPERATIVE FUND, and TANIMOTO, BILL in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate

letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3262 Decided by a vote of 5-0 to: (1) find reason to believe that FLORIDIANS FOR A GOOD ECONOMY, and ROBINSON, ERIC W in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3263 Decided by a vote of 5-0 to: (1) find reason to believe that FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION, and WOODY, SHARLYN MS in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3264 Decided by a vote of 5-0 to: (1) find reason to believe that FROZEN FOOD POLITICAL ACTION COMMITTEE, and REICH BODOR, ALISON in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3265 Decided by a vote of 5-0 to: (1) find reason to believe that GET OUR JOBS BACK, INC, and HOFFENBERG, STEVEN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3266 Decided by a vote of 5-0 to: (1) find reason to believe that GOVERNMENT IS NOT GOD, and MURRAY, NANCY in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3267 Decided by a vote of 5-0 to: (1) find reason to believe that GREAT LAKES SUPER POLITICAL ACTION COMMITTEE, and DWIGHT WASHINGTON in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3268 Decided by a vote of 5-0 to: (1) find reason to believe that ILLINOIS FAMILIES FIRST, and CAPRIO, D PAUL in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3270 Decided by a vote of 5-0 to: (1) find reason to believe that MASON CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE-MACPAC, and JEFF BUCZKIEWICZ in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3271 Decided by a vote of 5-0 to: (1) find reason to believe that MCCASKILL SENATE FUND, and MICHELLE SHEROD in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3272 Decided by a vote of 5-0 to: (1) find reason to believe that MECHANICAL CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (MCA-PAC), and JOHN, MCNERNEY P. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3273 Decided by a vote of 5-0 to: (1) find reason to believe that MICHIGAN DOCTORS POLITICAL ACTION COMMITTEE - MICHIGAN STATE MEDICAL SOCIETY, and SCOT F. GOLDBERG, MD in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3274 Decided by a vote of 5-0 to: (1) find reason to believe that MILLENNIALS RISING PAC, and GOODWIN, MICHELLE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3275 Decided by a vote of 5-0 to: (1) find reason to believe that NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC, and MICHAEL J. CORREIA in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3276 Decided by a vote of 5-0 to: (1) find reason to believe that NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE, and COCKFIELD, WAYNE in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3277 Decided by a vote of 5-0 to: (1) find reason to believe that NATIONAL RIGHT TO LIFE VICTORY FUND, and COCKFIELD, WAYNE in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3278 Decided by a vote of 5-0 to: (1) find reason to believe that PENINSULA DEMOCRATIC COALITION, and ZACHERY ROSS in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3279 Decided by a vote of 5-0 to: (1) find reason to believe that PHYLLIS SCHLAFLY EAGLE FORUM PAC, and SCHLAFLY, JOHN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3280 Decided by a vote of 5-0 to: (1) find reason to believe that RIGHTS & DEMOCRACY PROJECT, and LEYSHON, TRAVEN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil

money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3281 Decided by a vote of 5-0 to: (1) find reason to believe that RUN RAY RUN, and GIANNI DONATES in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3282 Decided by a vote of 5-0 to: (1) find reason to believe that RUSS VICTORY FUND, and MILLER, JOHN W. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3284 Decided by a vote of 5-0 to: (1) find reason to believe that THE DEMOCRATIC COALITION, and LUCIA, FRANCESCA N in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3285 Decided by a vote of 5-0 to: (1) find reason to believe that TURKISH AMERICAN HERITAGE POLITICAL ACTION COMMITTEE - TURKISHPAC, and KUNT, TEKIN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

March 30, 2017

Date



Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 31, 2017

Traven Leyshon, in official capacity as Treasurer
Rights & Democracy Project
81 Elm Street, Unit B
Nashua, NH 03060

C00626697
AF#: 3280

Dear Mr. Leyshon:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 20, 2016 through November 28, 2016 shall be filed no later than December 8, 2016. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On March 29, 2017, the FEC found that there is reason to believe ("RTB") that Rights & Democracy Project and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before December 8, 2016. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$4,862. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$4,862 is due within forty (40) days of the finding, or by May 8, 2017, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive
Level of Activity: \$97,032
Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purpose of calculating the penalty)
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or May 8, 2017. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Rights & Democracy Project and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Aimee Wechsler in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Steven T. Walther
Chair

CONFIDENTIAL

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$4,862 for the 2016 Post-General Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Rights & Democracy Project

FEC ID#: C00626697

AF#: 3280

PAYMENT DUE DATE: May 8, 2017

PAYMENT AMOUNT DUE: \$4,862



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

July 3, 2017

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP* for AP
Staff Director

FROM: Patricia C. Orrock *DC* for PCO
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: *KR*
Kristin D. Roser/Ben Holly
Reports Analysis Division
Compliance Branch

SUBJECT: Final Determination Recommendation -
2016 30 Day Post-General Report (Unauthorized Committees) for the
Administrative Fine Program

2017 JUL -3 PM 11:54
RECEIVED
SENSITIVE

CONFIDENTIAL

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2016 30 Day Post-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, four (4) committees disclosed a level of activity after the RTB finding, which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Citizens SuperPAC for America (CSPAC) (AF 3257) disclosed no activity after the RTB finding (previously estimated to be \$46,542), which would result in no civil money penalty (fine previously assessed to be \$1,470).

Frozen Food Political Action Committee (AF 3264) filed the 2016 30 Day Post-General Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$110 (previously estimated to be \$29,983), thus the fine would be lowered from \$1,176 to \$110. The committee paid the civil money penalty assessed at RTB; we will therefore issue a refund for the difference (\$1,066).

Get Our Jobs Back, Inc. (AF 3265) disclosed no activity after the RTB finding (previously estimated to be \$50,324,263), which would result in no civil money penalty (fine previously assessed to be \$16,671).

Great Lakes Super Political Action Committee (AF 3267) disclosed no activity after the RTB finding (previously estimated to be \$31,500), which would result in no civil money penalty (fine previously assessed to be \$1,176).

For your information, two (2) committees disclosed a change in treasurer after the RTB finding. An overview of these cases is provided below.

Frozen Food Political Action Committee (AF 3264) filed an Amended Statement of Organization after the RTB finding designating Brandon Partridge as Treasurer.

Rights & Democracy Project (AF 3280) filed an Amended Statement of Organization after the RTB finding designating Maria Fitzsimmons as Treasurer.

RAD Recommendation

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.
- (2) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.
- (3) Send the appropriate letters.

Federal Election Commission
 FD Circulation Report Fine Paid
 2016 POST-GENERAL Not Election Sensitive 12/08/2016 UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
3254	ARTICLE 1 POLITICAL ACTION COMMITTEE		C00461824	RICK GALENA	12/29/2016	21	\$27,300	0	03/29/2017	\$823	\$823	05/09/2017	\$823
3255	BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC)		C00559146	JERED TAYLOR	01/28/2017	Not Filed	\$9,042	0	03/29/2017	\$392	\$392	05/02/2017	\$392
3256	BRADY VICTORY FUND	KEVIN BRADY	C00531285	MICHAEL J. KARLINS	12/14/2016	6	\$150,642	0	03/29/2017	\$2,360	\$2,360	04/26/2017	\$2,360
3258	COMMUNICATION WORKERS OF AMERICA LOCAL 13000		C00109585	MARISA MACCROBRY	1/5/2017	28	\$23,284	0	03/29/2017	\$307	\$307	04/20/2017	\$307
3259	CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION		C00388181	JOHN P. LACEY	1/31/2017	Not Filed	\$2,500	0	03/29/2017	\$326	\$326	04/18/2017	\$326
3260	DC REPUBLICAN PARTY FEDERAL ACCOUNT		C00191288	RODERICK JOHNSON	1/17/2017	Not Filed	\$870	0	03/29/2017	\$326	\$326	05/09/2017	\$326
3261	FARMERS' RICE COOPERATIVE FUND		C00146605	BILL TANIMOTO	12/16/2016	8	\$8,200	0	03/29/2017	\$113	\$113	05/02/2017	\$113
3264	FROZEN FOOD POLITICAL ACTION COMMITTEE		C00365740	BRANDON PARTRIDGE	5/6/2017	Not Filed	\$110	0	03/29/2017	\$1,176	\$1,176	5/2/2017	\$1,176*
3266	GOVERNMENT IS NOT GOD		C00287531	NANCY MURRAY	12/19/2016	11	\$5,672	0	03/29/2017	\$131	\$131	04/13/2017	\$131
3268	ILLINOIS FAMILIES FIRST MASON CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE MACPAC		C00609859	D. PAUL CAPRIO	1/31/2017	Not Filed	\$300	0	03/29/2017	\$300	\$300	04/11/2017	\$300
3270	MCCASKILL SENATE FUND	CLAIRE MCCASKILL	C00577148	JEFF BUCZKIEWICZ	1/4/2017	27	\$1,000	0	03/29/2017	\$195	\$195	04/12/2017	\$195
3271	MECHANICAL CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (MCA-PAC)		C00343590	MICHELLE SHEROD	1/5/2017	28	\$1,132	0	03/29/2017	\$201	\$201	04/18/2017	\$201
3272	MICHIGAN DOCTORS POLITICAL ACTION COMMITTEE - MICHIGAN STATE MEDICAL SOCIETY		C00001180	JOHN P. MCNERNEY	1/5/2017	28	\$6,100	1	03/29/2017	\$291	\$291	05/02/2017	\$291
3273	MILLENNIALS RISING PAC		C00571550	SCOT F. GOLDBERG, MD	1/29/2017	Not Filed	\$6,702 (est)	0	03/29/2017	\$392	\$392	05/09/2017	\$392
3274	NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC		C00528026	MICHELL GOODWIN	1/20/2017	Not Filed	\$185	0	03/29/2017	\$185	\$185	04/17/2017	\$185
3275	NATIONAL RIGHT TO LIFE VICTORY FUND		C00111278	MICHAEL J. CORREIA	02/16/2017	Not Filed	\$24,000	0	03/29/2017	\$654	\$654	04/17/2017	\$654
3276	NATIONAL RIGHT TO LIFE VICTORY FUND		C00509883	WAYNE COCKFIELD	12/16/2016	8	\$355,478	0	03/29/2017	\$4,995	\$4,995	05/02/2017	\$4,995
3277	PENINSULA DEMOCRATIC COALITION		C00427203	WAYNE COCKFIELD	12/20/2016	12	\$512,611	0	03/29/2017	\$6,797	\$6,797	05/02/2017	\$6,797
3278	RIGHTS & DEMOCRACY PROJECT		C00626697	ZACHERY ROSS	1/13/2017	Not Filed	\$2,019	0	03/29/2017	\$326	\$326	05/05/2017	\$326
3280	RUN RAY RUN		C00574806	MARIA FITZSIMMONS	02/22/2017	Not Filed	\$97,032	0	03/29/2017	\$4,862	\$4,862	05/08/2017	\$4,862
3281	RUSS VICTORY FUND		C00586180	GIANNI DONATES	1/15/2017	Not Filed	\$42,636 (est)	0	03/29/2017	\$1,176	\$1,176	06/05/2017	\$1,176
3282				JOHN W. MILLER	1/4/2017	27	\$1,491,744	0	03/29/2017	\$14,425	\$14,425	04/28/2017	\$14,425

* This committee disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty and will be assessed a civil money penalty at Final Determination (FD) that has been reduced since the RTB finding. This committee paid the civil money penalty assessed at RTB; therefore, we will issue a refund for the difference.

Federal Election Commission
FD Circulation Report Fine Not Paid
2016 POST-GENERAL Not Election Sensitive 12/08/2016 UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
3253	AMERICA COMES FIRST PAC		C00623256	DAVID W. SCHAMENS	12/14/2016	6	\$5,491	0	03/29/2017	\$101	89	\$101
3257	CITIZENS SUPER PAC FOR AMERICA (CSPAC)		C00498927	SIDDIQ MUMIN		Not Filed	\$0	1	03/29/2017	\$1,470	89	NONE
3262	FLORIDIANS FOR A GOOD ECONOMY		C00605634	ERIC W. ROBINSON	1/30/2017	Not Filed	\$2,380	0	03/29/2017	\$326	89	\$326
3263	FRESNO COUNTY DEMOCRATIC WOMEN'S CLUB/DEMOCRATS IN ACTION		C00404350	SHARLYN WOODY	6/26/2017	Not Filed	\$19,429	0	03/29/2017	\$654	89	\$654
3265	GET OUR JOBS BACK, INC		C00618078	STEVEN HOFFENBERG		Not Filed	\$0	0	03/29/2017	\$16,671	89	NONE
3267	GREAT LAKES SUPER POLITICAL ACTION COMMITTEE		C00624363	DWIGHT WASHINGTON		Not Filed	\$0	0	03/29/2017	\$1,176	89	NONE
3279	PHYLLIS SCHLAFLY EAGLE FORUM PAC		C00109937	JOHN SCHLAFLY	1/25/2017	Not Filed	\$2,197	0	03/29/2017	\$326	89	\$326
3283	SWING STATES FOR A CONSERVATIVE WHITE HOUSE PAC INC		C00362632	OFFICE OF TREASURER		Not Filed	\$44,816 (est)	0	03/29/2017	\$1,176	89	\$1,176
3284	THE DEMOCRATIC COALITION		C00612846	FRANCESCA N. LUCIA	1/18/2017	Not Filed	\$59,195	0	03/29/2017	\$654	89	\$654
3285	TURKISH AMERICAN HERITAGE POLITICAL ACTION COMMITTEE - TURKISHPAC		C00454140	TEKIN KUNT	12/20/2016	12	\$16,910	0	03/29/2017	\$211	89	\$211

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3280
Withdrawal and Resubmission of Final)
Determination Recommendation - 2016)
30 Day Post-General Report)
(Unauthorized Committees) for the)
Administrative Fine Program: Rights &)
Democracy Project and Maria)
Fitzsimmons, as Treasurer)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 06, 2017, the Commission decided by a vote of 5-0 to take the following actions in AF 3280:

1. Make a final determination that Rights & Democracy Project and Maria Fitzsimmons, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty of \$4,862.
2. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

July 7, 2017
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 2017

Maria Fitzsimmons, in official capacity as Treasurer
Rights & Democracy Project
83 Hanover Street, Suite 26
Manchester, NH 03101

C00626697
AF#: 3280

Dear Ms. Fitzsimmons:

On March 29, 2017, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Rights & Democracy Project and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2016 Post-General Report. By letter dated March 31, 2017, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$4,862 in accordance with the schedule of penalties at 11 CFR § 111.43.

On May 8, 2017, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on July 6, 2017 that Rights & Democracy Project and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$4,862 in accordance with 11 CFR § 111.43, and voted to close the file.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding this matter, please contact Aimee Wechsler on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in cursive script that reads "Steven T. Walther".

Steven T. Walther
Chair

RIGHTS AND DEMOCRACY PROJECT INC.
70 SOUTH WINOOKI AVE., #205
BURLINGTON, VT 05401

VSECU
MONTPELIER, VT
58-91182116

1206

PAY TO THE
ORDER OF

Federal Election Commission

05/02/2017

\$
**4,862.00

DOLLARS

Four thousand eight hundred sixty-two and 00/100

Federal Election Commission
P.O. Box 979058
St. Louis, MP 63197-9000
United States


AUTHORIZED SIGNATURE

MEMO

DO NOT ACCEPT THIS CHECK WITHOUT CONFIRMING PRESENCE OF MICROPRINTED SECURITY FEATURES ON THE FRONT, CITIZEN SECURITY PRINTING & ALL LISTED ON REVERSE

0001-UT-11-001-11

